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VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Re: **Docket No. 18-035-27**—In the Matter of Rocky Mountain Power’s Semi-Annual Demand Side Management (DSM) Forecast Reports.

Utah Clean Energy (“UCE”) is submitting these comments in response to Rocky Mountain Power’s (“RMP”) Annual Demand Side Management Deferred Account and Forecast Report filed on November 1, 2018. UCE appreciates the opportunity to submit comments in response to this filing.

On August 1, 2018, UCE submitted comments on RMP’s Semi-Annual DSM Forecast Report filed on July 2, 2018. UCE’s comments primarily focused on RMP’s decreased projected DSM expenditures and unchanged collection rate, and requested additional explanation regarding increases and decreased in specific program expenditures. In the Public Service Commission’s (“Commission”) August 20, 2018 correspondence, it noted that the appropriate forum for these comments is the DSM Steering Committee and the Integrated Resource Plan (IRP) process.¹

UCE followed the Commission’s guidance directing UCE to address our concerns in the Steering Committee and 2019 IRP process. UCE has engaged both the DSM Steering Committee and RMP IRP teams to discuss the issues from our August 1 comments. While these discussions are ongoing, it has proven difficult to find the appropriate forum to make these changes given the specific and limited focus of Steering Committee and IRP forums respectively. RMP indicated to the Steering Committee that the appropriate forum for discussing declining energy savings is the IRP process, and the IRP team indicated that the pursuit of all cost effective DSM beyond the IRP target is a discussion for the Steering Committee. UCE will continue working with RMP and other Steering Committee members to identify the appropriate forum for this discussion. However, given that RMP’s November 1st forecast projects continued declines in energy savings levels for 2019, compared to recent performance, UCE would like to reiterate our continued concern over RMP’s declining energy savings projections, as well as RMP’s treatment of the DSM levels from the IRP as a ceiling beyond which cost effective DSM is not being pursued.

¹ Correspondence from Gary L. Widerburg in Docket No. 18-035-27, found at <https://pscdocs.utah.gov/electric/18docs/1803527/304016CorresWiderburg8-20-2018.pdf>

Thank you for the opportunity to submit comments.

Sincerely,

/s/ Hunter Holman

Hunter Holman
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